REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicants thank the Examiner for carefully considering this application and for indicating that the Information Disclosure Statements submitted on November 29, 2006, January 25, 2007, September 7, 2007, and June 19, 2008 have been considered.

Disposition of Claims

Claims 1-39 are pending in this application. Claims 1, 14, and 27 are independent. The remaining claims depend, either directly or indirectly, from claim 1, 14, and 27.

Specification Amendments

The six paragraphs in the "RELATED U.S. APPLICANTIONS" section of the originally-filed specification are amended by way of this reply to replace the reference to U.S. Patent Application Number "xx/xxx,xxx" with the correct application numbers. No new matter is added by these amendments, as the amendments are merely to address informalities as requested by the Examiner.

Claim Amendments

Claims 1, 14, and 27 are amended to clarify aspects of the invention. Further, claims 4-6, 12-13, 16-19, 25-26, 29-32, and 38-39 are amended for conformity with the amendments to the independent claims. No new matter has been added by way of these amendments as support for the

amendments may be found, for example, on page 19, lines 4-25 and Figure 2 of the originally-filed specification.

Specification Objections

The Examiner objects to the Specification for including cross references with incorrect application numbers. As discussed above, the Specification is amended by way of this reply to include the correct application numbers as requested by the Examiner. In view of this, withdrawal of this objection is respectfully requested.

Rejections under 35 U.S.C. § 102

Claims 1-6, 9-11, 14-19, 22-24, 27-32, and 35-37 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,609,123 ("Cazemier"). The rejection is respectfully traversed.

Turning to the rejection, "[a] claim is anticipated only if *each and every element* as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987) (emphasis added). Further, "[t]he identical invention must be shown in as complete detail as is contained in the claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). The Applicants respectfully assert that Cazemier does not expressly or inherently describe each and every element of amended independent claim 1.

More specifically, amended independent claim 1 recites, in part, "a first source system for publishing a data change of an attribute of an entity, wherein said entity is one of a plurality of

entities," "a global object model coupled ... comprising said mapped relationships and said join model ... for forming said entity from a set of related entities, wherein at least one of said set of related entities is obtained from a second source system," and "a third source system for storing said entity formed by said join engine peer." In other words, amended independent claim 1 requires, in part, (1) a *first source system* for performing a data change on an attribute on an entity; (2) a global object model describing a relationship between the entity and a related entity on a *second source system*; and (3) a *third source system* for storing the entity generated by the join engine peer based on the global object model.

In contrast, Cazemier discloses a reporting system that is capable of *extracting* data from various data sets. *See* Cazemier, column 5 at lines 58-64. Further, Cazemier teaches that the query engine is configured to fulfill requests for information using metadata describing the various data sets. *See* Cazemier, column 7 at lines 11-24. However, the metadata of Cazemier only determines the data sets to be retrieved and included in *reports*. *See* Cazemier, column 6 at lines 1-8. Cazemier is completely silent with respect to metadata for defining dependencies used to *synchronize* one source system with data changes and attributes on other source systems. In view of this, it is clear that a reporting system using metadata to describe data sets as described in Cazemier is not equivalent to (1) a *first source system* for performing a data change on an attribute on an entity; (2) a global object model describing a relationship between the entity and a related entity on a *second source system*; and (3) a *third source system* for storing the entity generated by the join engine peer based on the global object model, as required by amended independent claim 1.

In view of the above, Cazemier fails to disclose all the limitations of amended independent claim 1. Thus, independent claim 1 is patentable over Cazemier. Amended independent claims 14

and 27 include substantially similar limitations as amended independent claim 1 and, thus, are

patentable over Cazemier for at least the same reasons.   Dependent claims 2-6, 9-11, 15-19, 22-24,

28-32, and 35-37 depend, directly or indirectly, from claim 1, 14, or 27 and are patentable for at

least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Rejection under 35 U.S.C. § 103

MPEP § 2143 states that "[t]he key to supporting any rejection under 35 U.S.C. 103 is the

clear articulation of the reason(s) why the claimed invention would have been obvious. The

Supreme Court in *KSR* noted that the analysis supporting a rejection under 35 U.S.C. 103 should be

made explicit." Further, when combining prior art elements, the Examiner "must articulate the

following: (1) a finding that the prior art included each element claimed, although not necessarily in

a single prior art reference, with the only difference between the claimed invention and the prior art

being the lack of actual combination of the elements in a single prior art reference; ..." MPEP §

2143(A).

Claims 12-13, 25-26, and 38-39

Claims 12-13, 25-26, and 38-39 stand rejected under 35 U.S.C. § 103(a) as being

unpatentable over Cazemier in view of U.S. Patent No. 5,787,415 ("Jacobson"). The rejection is

respectfully traversed.

As discussed above, Cazemier fails to disclose (1) a *first source system* for performing a data

change on an attribute on an entity; (2) a global object model describing a relationship between the

entity and a related entity on a *second source system*; and (3) a *third source system* for storing the

entity generated by the join engine peer based on the global object model, as required by amended independent claim 1. In addition, Jacobson fails to provide that which Cazemier lacks. Jacobson discloses a decision support system configured to efficiently maintain a de-normalized relational database. *See* Jacobson, abstract. Specifically, Jacobson discloses that the complexity of maintaining the database "is minimized by alteration of the control files but not the utilities of previously known systems." *See id.* However, Jacobson is completely silent with respect to control files that define dependencies used to *synchronize* one source system with data changes and attributes on other source systems. Thus, Jacobson cannot disclose or render obvious (1) a *first source system* for performing a data change on an attribute on an entity; (2) a global object model describing a relationship between the entity and a related entity on a *second source system*; and (3) a *third source system* for storing the entity generated by the join engine peer based on the global object model, as required by amended independent claim 1.

In view of the above, Cazemier and Jacobson, whether viewed separately or in combination, fail to disclose or render obvious each and every limitation of amended independent claim 1. Thus, independent claim 1 is patentable over Cazemier and Jacobson. Amended independent claims 14 and 27 include substantially similar limitations as amended independent claim 1 and, thus, are patentable over Cazemier and Jacobson for at least the same reasons. Dependent claims 12-13, 25-26, and 38-39 depend, directly or indirectly, from claim 1, 14, or 27 and are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 7-8, 20-21, and 33-34

Claims 7-8, 20-21, and 33-34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cazemier in view of U.S. Patent No. 6,842,904 ("Bartz"). The rejection is respectfully traversed.

As discussed above, Cazemier fails to disclose (1) a *first source system* for performing a data change on an attribute on an entity; (2) a global object model describing a relationship between the entity and a related entity on a *second source system*; and (3) a *third source system* for storing the entity generated by the join engine peer based on the global object model, as required by amended independent claim 1. In addition, Bartz fails to provide that which Cazemier lacks. Bartz discloses a versioning system that is capable of supporting diverse document formats and data types. *See* Bartz, abstract. Specifically, Bartz discloses an application program interface (API) that can be extended with plug-in protocol providers to support any number of version stores or versioning systems. *See id.* However, Bartz is completely silent with respect to a global object model that defines dependencies used to *synchronize* one source system with data changes and attributes on other source systems. Thus, Bartz cannot disclose or render obvious (1) a *first source system* for performing a data change on an attribute on an entity; (2) a global object model describing a relationship between the entity and a related entity on a *second source system*; and (3) a *third source system* for storing the entity generated by the join engine peer based on the global object model, as required by amended independent claim 1.

In view of the above, Cazemier and Bartz, whether viewed separately or in combination, fail to disclose or render obvious each and every limitation of amended independent claim 1. Thus, independent claim 1 is patentable over Cazemier and Bartz. Amended independent claims 14 and

27 include substantially similar limitations as amended independent claim 1 and, thus, are patentable over Cazemier and Bartz for at least the same reasons. Dependent claims 7-8, 20-21, and 33-34 depend, directly or indirectly, from claim 1, 14, or 27 and are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicants believe this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226/516001).

Dated: October 9, 2009　　　　　　　　　Respectfully submitted,

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